

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(BALTIMORE DIVISION)

2019 NOV -6 PM 4: 03

MS. YING JIN &  
MR. VICTOR H. SPARROW, III,  
1616 Park Avenue  
Baltimore, Maryland 21217-4290

Plaintiffs *pro se*,

U.S. BUREAU OF CITIZENSHIP &  
IMMIGRATION SERVICES,  
U.S. DEPARTMENT OF HOMELAND  
SECURITY, & MR. GREGORY  
COLLETT in his representative  
capacity as District Director  
Baltimore Field Office  
Bureau of Citizenship & Immigration Services  
U.S. Department of Homeland Security  
3701 Koppers Street  
Baltimore, Maryland 21227

Defendants.

Civil Case No.: 19cv3214 DLB  
BY \_\_\_\_\_ DEPUTY  
COMPLAINT FOR DAMAGES  
AND FOR INJUNCTIVE RELIEF.

**COMPLAINT FOR INJUNCTIVE RELIEF**

1. This is an action under the Freedom of Information Act, 5 **United States Code** § 552 *et seq.* ("FOIA") and the Privacy Act 5 **United States Code** § 552a *et seq.* ("Privacy Act") by the Plaintiffs *pro se*, jointly and severally, for injunctive and other appropriate relief and seeking the disclosure and release of agency records improperly withheld from Plaintiffs by Defendants United States Department of Homeland Security ("DHS") and its component Bureau of Citizenship & Immigration Services ("BCIS") and Gregory Collett, in his representative capacity as the Baltimore District Director of the Baltimore Field Office of the BCIS.

**Jurisdiction and Venue**

2. The United States District Court for the District of Maryland has both subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 5 **United States Code** § 552(a)(4)(B) *et seq.* and 5 **United States Code** § 552a(g)(3) *et seq.*

3. This Court has jurisdiction over this action pursuant to 28 **United States Code** § 1331. Venue lies within the District of Maryland pursuant to 5 **United States Code** § 552(a)(4)(B).

**The Parties.**

4. Plaintiff Victor H. Sparrow, III is a citizen of the United States by birth ("Sparrow"). Plaintiff Ying Jin is a citizen and national of the People's Republic of China by birth in Zhejiang Province, People's Republic of China on November 29, 1966 ("Ying"). Sparrow and Ying married in Hangzhou, China on November 29, 2014. Sparrow filed and Ying is the beneficiary of an approved "Petition to Classify" adjudicated by the Consulate of the United States at Guangdong, China as the "immediate relative" of a United States Citizen (BCIS Form I-130) (BCIS File Number: A# 059-225-843).

5. In that status Sparrow and Jin entered the United States in June 2015 at Los Angeles, California as Applicant and Beneficiary.

6. Plaintiffs Sparrow and Ying reside together as husband and wife at 1616 Park Avenue, Baltimore, Maryland 21217.

7. Plaintiffs Sparrow and Ying subsequently filed a completed "Application to Remove Temporary Conditions of Residency" (BCIS Form I-751). Ying has also filed a completed "Application for Naturalization" (BCIS Form N-400).

8. These completed applications together with supporting materials and FOIA and Privacy Act requests remain outstanding and unadjudicated by the United States Bureau of Citizenship and Immigration Services notwithstanding three (3) joint personal interviews at its Baltimore Field Office.

9. Defendant United States Bureau of Citizenship and Immigration Services with its Baltimore Field Office at 3701 Koppers Street, Baltimore, Maryland 21227 ("BCIS") under the supervision of Defendant District Director Gregory Collett is a component agency of the United States Department of Homeland Security ("DHS"), BCIS, DHS, and Collett are jointly and severally responsible for the adjudication of the applications filed by Sparrow and Ying with the jurisdiction area of the Baltimore area.

**Plaintiffs' FOIA and Privacy Act Requests and Defendants' Failure to Respond**

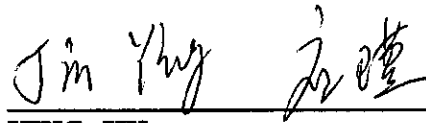
10. Plaintiffs Sparrow and Ying throughout the application process have filed numerous unanswered FOIA and Privacy Act requests with BCIS and DHS for information under the Freedom of Information Act and Privacy Acts.

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The Plaintiffs respectfully demand a trial by jury of all causes of action herein and an order allowing, permitting, and providing for the electronic filing of all pleadings and papers in this cause.

Dated: November 3, 2019

Respectfully submitted,

  
\_\_\_\_\_  
**YING JIN**

Plaintiff **pro se**  
1616 Park Avenue  
Baltimore, Maryland 21217  
United States of America

  
\_\_\_\_\_  
**VICTOR H. SPARROW, III**

Plaintiff **pro se**  
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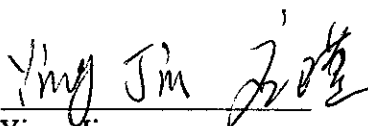
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**VERIFICATION**

We, Ying Jin & Victor H. Sparrow, III, in our personal capacities based upon our own personal knowledge state and declare under penalty of perjury including but not limited to 28 **United States Code** § 1746 under the laws of the State of Maryland and those of the United States of America, that we have read and are thoroughly familiar with each of the allegations of the foregoing "Complaint for Damages & Injunctive Relief." Each of the allegations ii it is true and correct based upon our own personal knowledge. Each of the documents attached to this Complaint is a true xerographic copy of a document which is now or has been in our possession.

Executed on this 3rd day of November 2019 at the City of Baltimore within the State of Maryland.

Dated: November 3, 2019

  
\_\_\_\_\_  
Ying Jin  
Plaintiff **pro se**

  
\_\_\_\_\_  
Victor H. Sparrow, III  
Plaintiff **pro se**